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9 Attorneys for Defendant
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 CONSUMER FINANCIAL
14 PROTECTION BUREAU,

15 Plaintiff,

16 v.

17 EXPERIAN INFORMATION
18 SOLUTIONS, INC.,

19 Defendant.

20 Case No. 8:25-cv-00024-MWC-DFM

21 **NOTICE OF AND MOTIONS OF
DEFENDANT EXPERIAN
INFORMATION SOLUTIONS,
INC.'S TO PARTIALLY DISMISS
THE AMENDED COMPLAINT
AND TO STRIKE**

22 Date: July 25, 2025
23 Time: 1:30 p.m.
24 Place: Courtroom 6A

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT Defendant Experian Information
3 Solutions, Inc. (“EIS”) will, and hereby does, move pursuant to Federal Rule of Civil
4 Procedure 12(b)(6) for an Order dismissing Counts V, VI, and VII of Plaintiff
5 Consumer Financial Protection Bureau’s (the “Bureau”) Amended Complaint with
6 prejudice. Experian further moves pursuant to Federal Rule of Civil Procedure 12(f)
7 to strike any allegations of a tolling agreement from the Amended Complaint. This
8 motion will be heard on July 25, 2025, at 1:30 p.m., in the courtroom of the
9 Honorable Michele Williams Court, located at United State Courthouse, 350 West
10 First Street, Courtroom 6A, 6th Floor, Los Angeles, California 90012.

11 This motion is based upon this Notice of Motion and Motion, the
12 accompanying Memorandum of Points and Authorities, the concurrently filed
13 Request for Judicial Notice, all of the papers on file in this action, and any other such
14 evidence and argument that may be presented to the Court prior to its ruling on the
15 Motion.

16 As set forth in the accompanying Declaration of Ryan D. Ball, the parties
17 conferred pursuant to L.R. 7-3 in advance of filing this motion.

19 || Dated: June 20, 2025

JONES DAY

By: /s/ Richard J. Grabowski
Richard J. Grabowski

Attorneys for Defendant
**EXPERIAN INFORMATION
SOLUTIONS, INC.**